

DOC
D. O'Shaughnessy Consulting, Inc.

Sept 21, 2016

US EPA (7508P)
Document Processing Desk (DCI/ PRO)
Rm S-4900
2777 S. Crystal Dr.
Arlington, VA 22202
ATTN: Steven Snyderman

RE: Mancozeb DCI Joint 23, 2016. response from Agrla Canada, Inc.

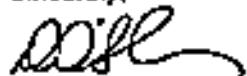
D. O'Shaughnessy Consulting, Inc. is the authorized Agent for Agrla Canada, Inc., and Agrla S.A. of Bulgaria, the parent company of Agrla Canada Inc. (collectively "Agrla").

Enclosed is the response to the subject DCI. Agrla intends to support the continued registration of mancozeb, and has offered to share in the cost of developing data to this effect with the current registrants as listed in the DCI, with the following notes:

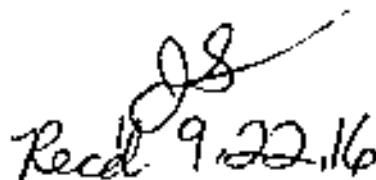
1. We previously contacted EPA and noted that the DCI erroneously identified the pertinent Agrla registration as 89333-4, when in fact it should have been 89333-3. This has been corrected on the response form.
2. Cheminova has been purchased by FMC and accordingly, the offer to cost-share has been directed to FMC.
3. United Phosphorus, Inc. ("UPI"), as well as other "integrated process" registrants have historically supported 'holistic' data requirements via the Mancozeb Task Force and ETU Task Force. These other registrants, not having TGAI registrations *per se*, were not listed in the DCI. Never-the-less, Agrla has included offers to cost-share to these task forces. Dave Olson of UPI is Chair of the Task Forces, and so proof of delivery to Mr. Olson is proof of delivery to the Task Forces.
4. In 2 cases, Agrla has opted for Option 4, i.e. to submit existing data not previously submitted to EPA (generated for EU purposes). Specifically these studies are chronic honey bee studies. These will be submitted under separate cover in PRZ format after pre-assigned MRIDs are obtained.
5. It is noted in the offers to cost-share, that Agrla conditionally also offers to cost-share in the event that EPA finds the existing honey bee data not suitable. Given the "Special Study" designation and the lack of a final guideline for these studies, Agrla believes this is a reasonable approach when a definitive certification of meeting guideline is not possible.
6. We note that there is an application in progress to transfer the registrations held by Agrla Canada, Inc. to Agrla S.A. Agrla Canada, Inc. is a wholly-owned subsidiary of Agrla S.A., and Agrla S.A. takes full responsibility to uphold the requirements of this DCI.

If the Agency has any questions on this matter, please feel free to contact me at any of the coordinates on this letterhead (noting that the Canadian address is not relevant to this action.)

Sincerely,



Don O'Shaughnessy, Ph.D., DABT

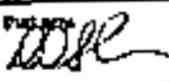


Rec'd 9/22/16

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2010-0174
EPA FORM 6330-4

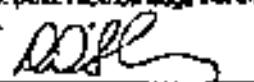
INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address AGRA CANADA, INC. 427 KODIA WAY CIRCLE CLD PLN, KY 42720	2. Case # and Name 0863 - Marcazab Chemical # and Name: 014504 Marcazab	3. Date and Type of DCI and Number 23-Jun-2016 GENERIC ID #: OOO-014504-1500		
4. EPA Product Register	5. I wish to cancel this product registration voluntarily	6. Generic Data 6a. Just claiming a Generic Data Exemption because both in the active ingredients from the source EPA registration number listed below.	7. Product Specific Data 7a. My product is a MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response".	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response".
		YES	NA	NA
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I know my false or misleading statement may be punishable by fine, imprisonment or both under applicable law.			Signature:  Sept. 17, 2018	
Signature and Title of Company's Authorized Representative			9. Date Sept. 17, 2018	
10. Name of Company Agri Canada, Inc.			11. Phone Number 270-524-5633	

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address		2. Case # and Name					3. Date and Type of DCH and Number		
AGRIA CANADA, INC. 427 HIDEAWAY CIRCLE CLUB RUN, KY 42729		0643 - Mancosab Chemical # and Name: D14504 Mancosab					23-Jun-2016 GENERIC ID # GDCH-D14504-1586		
4. Guidelines Requirement Number	5. Study Title		P R O T O C O L	Progress Reports	6. Use Pattern	7. Test Substance	8. Test Frequency (Months)	9. Registrant Response	
			1	2	3				
Environmental Fate Data Requirements (Conventional Chemicals) 635.2120 Hydrolysis of parent and degradates as a function of pH at 25 °C 635.4100 Aerobic soil metabolism 635.4300 Aerobic aquatic metabolism 635.4400 Anaerobic aquatic metabolism Nontarget Plant Protection Data Requirements (Conventional Chemicals) 650.4100 Seedling Emergence and Seedling Growth 650.4150 Vegetative Vigor 650.4400 Aquatic Plant Toxicity Using Lemna spp		IHK,C,B,A	TOAI	12	3				
		IHK,C,B,A	DKCR	24	3				
		IHK,C,B,A	DKCR	24	3				
		IHK,C,B,A	Degr. TOAI	24	3				
		IHK,C,B,A	TBP	12	3				
		IHK,C,B,A	TBP	12	3				
		IHK,C,B,A	TOAI	12	3				
10. Certification: I verify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.						11. Date  Sept. 17, 2016			
Signature and Title of Company's Authorized Representative									
12. Name of Company			Agria Canada, Inc.			13. Phone Number 270-524-5633			

United States Environmental Protection Agency

Washington, D.C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSECWA Approval 2010-0126
EPA FORM 5300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions, and supply the information requested on this form. Use add-on sheet(s) if necessary.

1. Company Name and Address AGRA CANADA INC. 427 HIDE AWAY CIRCLE CLIF RIVER, KY 42129	2. Case # and Name 0543 - Marcozeb Chemical ID and Name: 014504 Marcozeb	3. Date and Type of DO and Number 23-Jun-2010 GENERIC ID #: 000-014504-1569					
4. Guidance Requirement Number	5. Study to:	P R O T O C O L	Progress Reports	6. Use Pattern	7. Test Substance	8. Test Period (Months)	9. Registrant Response
			1 2 3				
	Pesticide Chemistry Data Requirements for Food Uses (Commodity and Chemical)						
860.1420	Meat/Meat/poultry/ticks	(1)	N	IM,K,C,B,A	TGAJ	24	3
860.1568	Crop field trials (TOBA COC)	(8, 25)	N	IM,K,C,B,A	TEP	24	3
860.1500	Crop field trials (SAFFLOWER, SEED)	(25)	N	IM,K,C,B,A	TEP	24	3
860.1550	Confined accumulation in rotational crops		N	IM,K,C,B,A	TEP	24	3
	Terrestrial and Aquatic Non-target Organisms Data Requirements (Commodity and Chemical)						
850.2100	Aylen acute or toxicity test	(10, 25)	N	IM,K,C,B,A	TGAJ	12	3
850.2200	Aylen toxicity test	(2)	N	IM,K,C,B,A	TGAJ	12	3
850.0840	Field testing for persistence	(2, 5, 7, 21)	Y	IM,X,C,B,A	TEP	24	3

**United States Environmental Protection Agency
Washington, D.C. 20460**
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 8300J

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheets if necessary.

1. Company Name and Address

AGRA CANADA, INC.
427 MEADOWAY CIRCLE
CLIF RUNKY 42720

2. Case # and Name

0643 - Vinclozolin
Chemical's and Name: 014504
Vinclozolin

3. Date and Type of DO and Number

20-JUN-2018
GENERIC
ID #: G000-014504-1568

4. Guideline Requirement Number	5. Study Title		P R O T Q C O L	Program Reports			6. Use Pattern	7. Test Substance	8. Test Frame (months)	9. Registrant Response
				1	2	3				
70-A-SS	Pesticide Monitoring	(1, 31)	Y				IHKGBA	TEP	24	3
050-1500	Algal Toxicity	(20)	N				IHKGBA	TGA1	12	3
050-1550	Cyanobacteria (Anabaena Flavescens) Toxicity	(22)	N				IHKGBA	TGA1	12	3
050-0100	Environmental Chemistry Methods and Associated Independent Laboratory Validation	(11, 26, 27)	N				IHKGBA	Degr, TGA1	12	3
000-1520	Processed food/feed (OAT, GRAIN/ROLLED OATS)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (WHEAT, MOLD, MG5)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (POTATO)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (WHEAT, GRAM)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (WHEAT, GORN)	(8)	N				IHKGBA	TEP	24	3

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2010-0174
EPA Form 6330-4

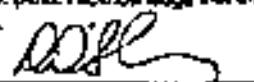
INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address AGRA CANADA, INC. 427 KODIA WAY CIRCLE CLD PLN, KY 42720	2. Case # and Name 0863 - Marcazab Chemical # and Name: 014504 Marcazab	3. Date and Type of DCI and Number 23-Jun-2016 GENERIC ID #: OOO-014504-1500		
4. EPA Product Register	5. I wish to cancel this product registration voluntarily	6. Generic Data 6a. Just claiming a Generic Data Exemption because both in the active ingredients from the source EPA registration number listed below.	7. Product Specific Data 7a. My product is a MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response".	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
		YES	NA	NA
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I know my false or misleading statement may be punishable by fine, imprisonment or both under applicable law.			 Signature	
Signature and Title of Company's Authorized Representative			9. Date Sept. 17, 2018	
10. Name of Company Agri Canada, Inc.			11. Phone Number 270-524-5633	

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address		2. Case # and Name					3. Date and Type of DCH and Number		
AGRIA CANADA, INC. 427 HIDEAWAY CIRCLE CLUB RUN, KY 42729		0643 - Mancosab Chemical # and Name: D14504 Mancosab					23-Jun-2016 GENERIC ID # GDCI-D14504-1586		
4. Guidelines Requirement Number	5. Study Title		P R O T O C O L	1 2 3	Progress Reports	6. Use Pattern	7. Test Substance	8. Test Frequency (Months)	9. Registrant Response
Environmental Fate Data Requirements (Conventional Chemicals) 635.2120 Hydrolysis of parent and degradates as a function of pH at 25 °C 635.4100 Aerobic soil metabolism 635.4300 Aerobic aquatic metabolism 635.4400 Anaerobic aquatic metabolism Nontarget Plant Protection Data Requirements (Conventional Chemicals) 650.4100 Seedling Emergence and Seedling Growth 650.4150 Vegetative Vigor 650.4400 Aquatic Plant Toxicity Using Lemna spp									
10. Certification: I verify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date  Sept. 17, 2016		
Signature and Title of Company's Authorized Representative									
12. Name of Company				Agria Canada, Inc.			13. Phone Number 270-524-5633		

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

CMV Approval 2010-0126
EPA FORM 5300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions, and supply the information requested on this form. Use add-on sheet(s) if necessary.

1. Company Name and Address AGRA CANADA INC. 427 HIDE AWAY CIRCLE CUE RIVER, KY 42229	2. Case # and Name 0543 - Mancosab Chemical # and Name: 014504 Mancosab	3. Date and Type of OC and Number 23-Jun-2010 GENERIC ID #: OOO-014504-1569					
4. Guidance Requirements Number	5. Study to	6. Progress Reports	7. Use Pattern	8. Test Substance	9. Test Frame (Months)	10. Registrant Response	
		P R O T O C O L	1 2 3				
	Pesticide Chemistry Data Requirements for Food Uses (Commercial and Residential)						
860.1420	Meat/Meat/poultry/ticks	(1)	N	IH,K,C,B,A	TGAI	24	3
860.1568	Crop field trials (TOBA COC)	(8, 25)	N	IH,K,C,B,A	TEP	24	3
860.1500	Crop field trials (SAFFLOWER, SEED)	(25)	N	IH,K,C,B,A	TEP	24	3
860.1550	Confined accumulation in rotational crops		N	IH,K,C,B,A	TEP	24	3
	Terrestrial and Aquatic Non-target Organisms Data Requirements (Commercial Use Only)						
850.2100	Aylen acute or subacute test	(10, 25)	N	IH,K,C,B,A	TGAI	12	3
850.2200	Aylen acute or subacute test	(2)	N	IH,K,C,B,A	TGAI	12	3
850.0840	Field testing for persistence	(2, 5, 7, 21)	Y	IH,K,C,B,A	TEP	24	3

**United States Environmental Protection Agency
Washington, D.C. 20460**
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 8300J

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheets if necessary.

1. Company Name and Address

AGRA CANADA, INC.
427 MEADOWAY CIRCLE
DUBLIN, OHIO 43017

2. Case # and Name

0643 - Vinclozolin
Chemical's and Name: 014504
Vinclozolin

3. Date and Type of DO and Number

20-JUN-2013
GENERIC
ID # G000-014504-1568

4. Guidance Requirement Number	5. Study Title		P R O T Q C O L	Program Reports			6. Use Pattern	7. Test Substance	8. Test Frame (months)	9. Registrant Response
				1	2	3				
70-A-SS	Pesticide Monitoring	(1, 31)	Y				IHKGBA	TEP	24	3
050-1500	Algal Toxicity	(20)	N				IHKGBA	TGA1	12	3
050-1550	Cyanobacteria (Anabaena Flourescens) Toxicity	(22)	N				IHKGBA	TGA1	12	3
050-0100	Environmental Chemistry Methods and Associated Independent Laboratory Validation	(11, 26, 27)	N				IHKGBA	Degr, TGA1	12	3
000-1520	Processed food/feed (OAT, GRAIN/ROLLED OATS)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (WHEAT, MOLD, MG5)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (POTATO)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (WHEAT, GRAM)	(8)	N				IHKGBA	TEP	24	3
000-1520	Processed food/feed (WHEAT, GORN)	(8)	N				IHKGBA	TEP	24	3

United States Environmental Protection Agency
Washington, D.C. 20460
REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name			3. Date and Type of DCI and Number							
AGRA CANADA, INC. 437 HIDEAWAY CIRCLE CLUB RUN, KY 42728	6643 - Mancoparb Chemical # and Name: 014504 Mancoparb			23-Jun-2010 GENERIC ID #: GDD-014504-1566							
4. Guidelines Requirement Number	5. Study ID#	Progress Reports			7. Test Substance	8. Test Frame [Months]	9. Registrant Response				
		P	R	O				T	G	C	L
SS-1310	Processed food/Feed (BARLEY, PEARLED BARLEY)	(8)	N		IHK,CBA	TEP	24	3			
SS-1311	Honey bee adult acute oral toxicity	(8)	N		IHK,CBA	TGAI	12	3			
SS-1313	Honey bee adult chronic oral toxicity	(12, 31)	Y		IHK,CBA	TGAI	12	3			
SS-1315	Semi-field testing for pollinators	(4, 17, 18, 31)	Y		IHK,CBA	TEP; TGAI	24	3			
SS-1316	Field trial of residues in pollen and nectar	(15, 30)	Y		IHK,CBA	TEP	24	3			
SS-1317	Honey bee larval acute oral toxicity	(14, 15, 31)	Y		IHK,CBA	TGAI	12	3			
SS-1318	Honey bee larval chronic oral toxicity	(12, 15, 31)	Y		IHK,CBA	TGAI	12	4			

Pages 11-12 - *Confidential Statements of Formula may be entitled to confidential treatment*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for the collection of information is estimated to average 1.25 hours per response for registration and 0.25 hrs per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimates or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2107), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Collection of Data

Applicant's/Registrant's Name, Address, and Telephone Number Agris Canada, Inc., 427 Hide Away Circle, Cub Run, KY 42729 270-524-5633	EPA Registration Number/File Symbol 68333-3
Active Ingredient(s) and/or representative test compound(s) mancozeb	Date Sept. 20, 2010
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Outdoor food / nonfood	Product Name

NOTE: If your product is a 100% reworking of another previously EPA-registered product, covered for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Extension Statement (EPA Form 8570-2).

I am responding to a Data-Call by Notice, and have included with this form a list of companies and offers of compensation (The Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the site-all method of support, and have included with this form a list of companies and offers of compensation (The Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or site-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

(Required if using the site-all method or when using the site-all option under the selective method to satisfy one or more data requirements.)

I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call in response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call in response. In addition, if the **site-all** option or **site-all** option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or (b)(4) I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter, (b) I have obtained the permission of the original data submitter to cite the study in 20% of this application; (c) at Periods of 10% by year compensation have expired for the study; (d) the study is in the public literature; or (e) I have noted in writing the contrary fact submitted for the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration or my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
	09/20/2010	Don O'Shaughnessy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.26 hours per response for registration activities and 0.25 hours per reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of the collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

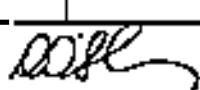
DATA MATRIX

Date: 09/20/2016	EPA Reg. No./File Symbol: 89333-3	Page 1 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 207 Bank St., Suite 412 Ottawa ON Canada K2P 2H2	Product Mancozeb Technical Fungicide	
Ingredients: mancozeb		
Guideline Reference Number	Guideline Study Name	MRID Number
830.1650	Product Identity and Composition	(CSF) 48449100
830.1600	Description of Materials Used to Produce the Product	48449101
830.1620	Description of Manufacturing Process	48449101
830.1670	Description of Formation of Impurities	48449101
830.1750	Certified Units	48229200
830.1800	Enforcement analytical method	48449102
830.6303	Physical State	48449103
830.6304	Odor	48449103
830.7300	Density	48449103
830.6302	Color	48449103
830.7000	pH	48449103
830.7200	Melting point	48449103
830.7220	Boiling point	48449103
830.6315	Flammability	48449103
Signature 	Name and Title Don O'Shaughnessy, Agent	Date 09/20/2018

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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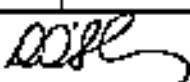
DATA MATRIX

Date	09/20/2016	EPA Reg. No./File Symbol	89333-3	Page 2 of 4
Applicant's/Registrant's Name & Address	Agris Canada, Inc., 133 Mayview St., Toronto, Ont. Canada M6P 2L8	Product	Mancozeb Technical Fungicide	
Ingredients	mancoset			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
830.6316	Explosivity	49449103	Agris Canada, Inc.	OWN
830.1700	Preliminary Analysis	49449102	Agris Canada, Inc.	OWN
870.1100	acute oral toxicity	49580308	Agris Canada, Inc.	OWN
870.1200	acute dermal toxicity	49580309	Agris Canada, Inc.	OWN
870.1300	acute inhalation toxicity	49580310	Agris Canada, Inc.	OWN
870.2400	acute eye irritation	49580311	Agris Canada, Inc.	OWN
870.2500	acute dermal irritation	49580312	Agris Canada, Inc.	OWN
870.2600	sensitization	49580313	Agris Canada, Inc.	OWN
870.2600	Sensitization - positive control	49580308	Agris Canada, Inc.	OWN
all other generic data		file all		PAY I
Signature		Name and Title	Don O'Shaughnessy, Agent	Date
				09/20/2016

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date	09/20/2016	EPA Reg. No./File Symbol	89333-3	Page 3 of 8
Applicant's/Registrant's Name & Address	Agria Canada, Inc., 133 Mervyn St., Toronto, Ont. Canada M5P 2L8	Product		
Ingredients: mancozeb			Mancozeb Technical Fungicide	
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
835.2120	Hydrolysis of parent and degradates	NEW	To be determined	PAY
835.4100	aerobic soil metabolism	NEW	To be determined	PAY
835.4300	aerobic aquatic metabolism	NEW	To be determined	PAY
835.4400	anaerobic aquatic metabolism	NEW	To be determined	PAY
850.4100	seedling emergence and growth	NEW	To be determined	PAY
850.4150	vegetative vigor	NEW	To be determined	PAY
850.4400	aquatic plant toxicity Lemma	NEW	To be determined	PAY
860.1400	residue meat milk eggs	NEW	To be determined	PAY
860.1500	crop field residue tobacco	NEW	To be determined	PAY
860.1500	field crop residue safflower	NEW	To be determined	PAY
860.1850	confined accumulation rot crops	NEW	To be determined	PAY
850.2100	avian acute	NEW	To be determined	PAY
850.2200	avian dietary	NEW	To be determined	PAY
850.3040	field testing pollinators	NEW	To be determined	PAY
Signature		Name and Title	Don O'Shaughnessy, Agent	Date
				09/20/2016

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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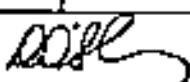
DATA MATRIX

Date	09/20/2016	EPA Reg. No./File Symbol	B9333-3	Page	4 of 4
Applicant's/Registrant's Name & Address	Agris Canada, Inc., 133 Meevety St., Toronto, Ont. Canada M6P 2L8	Product	Mancozeb Technical Fungicide		
Ingredients	mancozeb				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
70-A-55	residue monitoring	NEW	to be determined	PAY	2
850-4500	algae toxicity	NEW	to be determined	PAY	2
850-4550	cyanobacteria toxicity (Anabaena)	NEW	to be determined	PAY	2
850.6100	Env. chem methods & validation	NEW	to be determined	PAY	2
860-1520	processed food residue oats	NEW	to be determined	PAY	2
860.1520	processed food residue wheat middlings	NEW	to be determined	PAY	2
860.1520	proc food residue potatoes	NEW	to be determined	PAY	2
860.1520	processed food residue wheat grain	NEW	to be determined	PAY	2
860.1520	processed food residue wheat germ	NEW	to be determined	PAY	2
860.1500	field crop residue safflower	NEW	to be determined	PAY	2
860.1520	processed food residue barley	NEW	to be determined	PAY	2
SS-1311	honey bee acute oral	NEW	to be determined	PAY	2
SS-1313	honeybee chronic oral	NEW	Agris	OWN	2
SS1315	semi-field testing pollinators	NEW	to be determined	PAY	2
Signature		Name and Title	Don O'Shaughnessy, Agent	Date	09/20/2016

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WASHINGTON, D.C. 20460

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DATA MATRIX

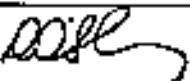
Date	09/20/2016	EPA Reg. No./File Symbol	89333-3	Page 5 of 8
Applicant's/Registrant's Name & Address	Product			
Agria Canada, Inc., 133 Manley St., Toronto, Ont. Canada M6P 2L8	Mancozeb Technical Fungicide			
Ingredients: mancozeb				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
SS-1310	Field residue pollen nectar	NEW	To be determined	PAY
SS-1317	Honeybee larval acute	NEW	To be determined	PAY
SS-1318	Honeybee larval chronic	NEW	Agria	OWN
Signature		Name and Title	Date	
		Don O'Shaughnessy, Agent	09/20/2016	

DATA MATRIX FOOTNOTES

Date 09/20/2016	EPA Reg. No./File Symbol 89333-3	Page 6 of 6
Applicant's/Registrant's Name & Address Agrio Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Footnote 2: Copies of offer-to-share letters sent to generic data supporters listed in DCI are attached separately

Signature		Name and Title Dan O'Shaughnessy, Agent	Date 09/20/2016
-----------	---	--	--------------------

MANCOZEB DATA SUBMITTERS, Product-specific

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
GREENSBORO, NC 27410

BAYER CROPSCIENCE LP
P.O. Box 12014
2 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

E. I. DU PONT DE NEMOURS AND CO., INC.
1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDOONELL BLVD
ST. LOUIS, MO 63142

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

BASF CORPORATION
P.O. Box 13520
28 DAVIS DRIVE
RESEARCH TRIANGLE PARK, NC 27709

MANCOZEB TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 3082E
INDIANAPOLIS, IN 46268

EBDC/ETU TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

SPRAY DRIFT TASK FORCE
1900 K STREET, NW
WASHINGTON, DC 20006

LINTER O PHOSPHORUS, INC.
630 FREEDOM BUSINESS CENTER,
SUITE 402
KING OF PRUSSIA, PA 19401

AGRICULTURAL REENTRY TASK FORCE
1300 1 STREET, NW
WASHINGTON, DC 20005

AGSCO INC
P.O. Box 13458
GRAND FORKS, ND 58208

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALLL DR.
ATLANTA, GA 30341

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
P.O. Box 509
1720 PROSPECT DRIVE
MACON, MO 63552

PLANT PROTECTANTS, LLC
35801 ROAD 132
VISALIA, CA 93292

GENERAL ENDANGERED SPECIES TASK FORCE
4110 13TH STREET, NORTHWEST
GIG HARBOR, WA 98332

FIFRA ENDANGERED SPECIES TASK FORCE LLP
1350 1 STREET, NW
WASHINGTON, DC 20005

CHEMINNOVA, INC.
ONE PARK DRIVE, SUITE 400
RESEARCH TRIANGLE PARK, NC 27709

MACDERMID AGRICULTURAL SOLUTIONS, INC.
ATTN. REGISTRATION DEPARTMENT
245 FREIGHT STREET

WATERBURY, CT 06702 WILBUR-ELLIS COMPANY
2903 S. CEDAR AVENUE
FRESNO, CA 93725

EVERRIS NA, INC.
P.O. Box 3310
DUBLIN, OH 43016

OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE
BEVERIDGE & DIAZMOND, P.C.
1350 I STREET, N.W.
WASHINGTON, DC 20005

AGROMARKETING CO, INC
D O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN, KY 42729

SIMPLOT, JR COMPANY
PO Box 198
LATHROP, CA 95330

PARKER ENGINEERING & CHEMICALS, INC
3171 MCCALL DR
ATLANTA, GA 30341

SEPRO CORPORATION
11550 N. MERIDIAN ST., SUITE 600
CARMEL, IN 46032

RE SIDONENTIAL EXPOSURE JOINT VENTURE (RE
CSP/PIR
1667 K STREET, NW SUITE 300
WASHINGTON, DC 20008

ZENITH CROP SCIENCES, SA
D O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN, KY 42729

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 08/19/2015			EPA Reg. No./FA Symbol 89333-3	Page 1 of 8	
Applicant's/Registrant's Name & Address			Product		
Agris Canada, Inc., 133 University St., Toronto, Ont. Canada M6P 2L8			Mancozeb Technical Fungicide		
Ingredients mancozeb					Ingredient
Guideline Reference Number	Submitter	Status	Note	Status	Note
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
			Agris Canada, Inc.	OWN	
Signature			Name and Title Don O'Shaughnessy, Agent	Date 08/19/2015	

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WASHINGTON, D.C. 20460

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DATA MATRIX

Date	08/19/2015	EPA Reg. No./File Symbol	69333-3	Page	2 of 8
Applicant/Registrant's Name & Address	Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product	Mancozeb Technical Fungicide		
Ingredient: mancozeb		Ingredient			
Guideline Reference Number	Submitter	Status	Note	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
				PAY	I
			Name and Title	Date	
Signature	Don O'Shaughnessy, Agent		08/19/2015	Date	
			Don O'Shaughnessy, Agent	08/19/2015	

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DATA MATRIX

Date 08/19/2015				EPA Reg. No./File Symbol 89333-3	Page 3 of 8
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Maytree St., Toronto, Ont. Canada M5P 2L8				Product Mancozeb Technical Fungicide	
Ingredients mancozeb					Ingredient
Guideline Reference Number	Submitter	Status	Note	Status	Note
			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
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			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
			to be determined	PAY	2
			Name and Title	Date	
Signature Don O'Shaughnessy, Agent			08/20/2016		Date
			Don O'Shaughnessy, Agent		08/19/2015

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460**

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DATA MATRIX

Date 08/19/2015		EPA Reg. No./File Symbol 69333-3	Page 4 of 8
Applicant's/Registrant's Name & Address		Product	
Agria Canada, Inc., 133 Mayview St., Toronto, ONL Canada M6P 2L2		Mancozeb Technical Fungicide	
Ingredients mancozeb			Ingredient
Guideline Reference Number	Submitter	Status	Note
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		To be determined	PAY 2
		Agria	OWN 2
		To be determined	PAY 2
		Name and Title	Date
Signature Don O'Shaughnessy, Agent		08/20/2015	Date
		Don O'Shaughnessy, Agent	08/19/2015

DATA MATRIX FOOTNOTES

Date 09/20/2016	EPA Reg. No./File Symbol 89333-3	Page 6 of 8
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Footnote 2: Copies of offer-to-share letters sent to generic data supporters listed in DCI are attached separately

Signature		Name and Title Don O'Shaughnessy, Agent	Date 09/20/2016
-----------	---	--	--------------------

MACDERMID AGRICULTURAL SOLUTIONS INC
ATTN REGISTRATION DEPARTMENT
249 FREIGHT STREET

WATERBURY CT 06702 WILBUR-ELLIS COMPANY
2003 S CEDAR AVENUE
FRESNO, CA 93725

EVERRISNA, INC
P.O. Box 3310
DUBLIN, OH 43018

OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE
BEVERIDGE & DIAMOND, P.C.
1350 1ST STREET, N.W.
WASHINGTON, DC 20005

AGROMARKETING CO., INC
D'OSHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN, KY 42729

SIMPLOT, JR. COMPANY
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LATHROP, CA 95330

PARKER ENGINEERING & CHEMICALS, INC
3171 MCCALL DR.
ATLANTA, GA 30341

SEPRO CORPORATION
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RESIDENTIAL EXPOSURE JOINT VENTURE (RE
CSPA/PIR
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ZENITH CROP SCIENCES, SA
D'OSHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN, KY 42729

MANCOZEB DATA SUBMITTERS

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
GREENSBORO, NC 27418

BAYER CROPSCIENCE LP
P.O. Box 12014
2 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

E. I. DU PONT DE NEMOURS AND CO., INC.
1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
830 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

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P.O. Box 660065
DALLAS, TX 75266

BASF CORPORATION
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26 DAVIS DRIVE
RESEARCH TRIANGLE PARK, NC 27709

MANCOZEB TASK FORCE
800 13TH STREET, NW
WASHINGTON, DC 20005

BONNAGROSCIENCES LLC
9330 ZIONSVILLE RD 30B2E
INDIANAPOLIS, IN 46268

EBOCYETU TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

SPRAY DRIFT TASK FORCE
1900 K STREET, NW
WASHINGTON, DC 20006

UNITED PHOSPHORUS, INC.
830 FREEDOM BUSINESS CENTER,
SUITE 402
KING OF PRUSSIA, PA 19401

AGRICULTURAL REENTRY TASK FORCE
1330 I STREET, NW
WASHINGTON, DC 20005

AGSDO INC
P.O. Box 13458
GRAND FORKS, ND 58208

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALL DR.
ATLANTA, GA 30341

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
PO Box 509
1720 PROSPECT DRIVE
MACON, MO 63352

PLANT PROTECTANTS, LLC
35801 ROAD 132
VASILLA, CA 93292

GENERIC ENDANGERED SPECIES TASK FORCE
4110 138TH STREET, NORTHWEST
GIG HARBOR, WA 98332

FIFRA ENDANGERED SPECIES TASK FORCE, LLP
1350 I STREET, NW
WASHINGTON, DC 20004

Cheminova, Inc.
One Park Drive, Suite 400
Research Triangle Park, NC 27709

dOC
D. O'Shaughnessy Consulting, Inc.

Sept 17, 2016

United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King Of Prussia, PA 19406
ATTN Dave Olson

Dear Mr. Olson,
RE: US EPA Mancozeb Generic Data Call-In ("DCI"), June 23, 2016, Offer to Cost-Share

D. O'Shaughnessy Consulting, Inc. is the designated Agent for Agria in matters of North American regulation of pesticide products, and is authorized to make the following offer..

Please be hereby advised that Agria S.A. (Bulgaria) and its wholly-owned subsidiary, Agria Canada, Inc. ("Agria") hereby offers to share costs of development of generic data as listed in the subject DCI with the following exception. Agria intends to submit its own existing data for requirement SS.1318 (honeybee larval chronic oral toxicity). Agria conditionally offers to cost-share for this requirement only in the event that US EPA deems the existing data owned by Agria to be insufficient for this DCI.

Agria offers to participate fully in the actions required to plan and develop the data, and share ownership of these data. This same offer to cost-share and jointly work to develop and own data is simultaneously being made to Drexel Chemical Company, FMC Agricultural Solutions who now control the mancozeb registration listed in the DCI as Cheminova Inc., and to the Mancozeb and ETU Task Forces, which represent other generic data developers not named in the DCI.

Please be notified that Agria S.A. has undertaken to transfer registrations of mancozeb products owned by Agria Canada to Agria S.A. This transfer does not in any way alter Agria's commitment to respect to the DCI.

Sincerely,


Dan O'Shaughnessy

Reed 9/22/16



DOC
D. O'Shaughnessy Consulting, Inc.

SepL 17, 2016

ETU Task Force
c/o Mr. Ed Ruckart,
McDermott, Will & Emery, LLP
600 19th SL NW
Washington, DC 20005

To whom it may concern,
RE: US EPA Mancozeb Generic Data Call-In ("DCI"), June 23, 2016, Offer to Cost Share

D. O'Shaughnessy Consulting, Inc. is the designated Agent for Agria in matters of North American regulation of pesticide products, and is authorized to make the following offer..

Please be hereby advised that Agile S.A. (Bulgaria) and its wholly-owned subsidiary, Agria Canada, Inc. ("Agria") hereby offers to share costs of development of generic data as listed in the subject DCI with the following exception. Agria intends to submit its own existing data for requirement SS-1318 (honeybee larval chronic oral toxicity). Agria conditionally offers to cost-share for this requirement only in the event that US EPA deems the existing data owned by Agria to be insufficient for this DCI.

Agria offers to participate fully in the actions required to plan and develop the data, and share ownership of these data. This same offer to cost-share and jointly work to develop and own data is simultaneously being made to United Phosphorus, Inc., FMC Agricultural Solutions who now control the mancozeb registration listed in the DCI as Cheminova Inc., and to Drexel Chemical Company.

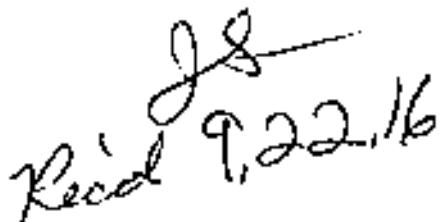
Please be notified that Agria S.A. has undertaken to transfer registrations of mancozeb products owned by Agria Canada to Agria S.A. This transfer does not in any way alter Agria's commitment to respond to the DCI.

Sincerely,



Don O'Shaughnessy

cc Dave Olson, Chairman



JS
Recd 9/22/16

dOC
D. O'Shaughnessy Consulting, Inc.

Sept. 17.2016

Mancozeb Task Force
c/o Mr. Ed Ruckert,
McDermott, Will & Emery, LLP
600 13th St NW
Washington, DC 20005

To whom it may concern,
RE: US EPA Mancozeb Generic Data Call-In ("DCI"), June 23, 2016, Offer to Cost-Share

D. O'Shaughnessy Consulting, Inc. Is the designated Agent for Agria In matters of North American regulation of pesticide products, and Is authorized to make the following offer..

Please be hereby advised that Agria S.A. (Bulgaria) and its wholly-owned subsidiary, Agria Canada, Inc. ("Agria") hereby offers to share costs of development of generic data as listed in the subject DCI with the following exception. Agria intends to submit its own existing data for requirement SS.1318 (honeybee larval chronic oral toxicity). Agria conditionally offers to cost-share for this requirement only in the event that US EPA deems the existing data owned by Agria to be insufficient for this DCI.

Agria offers to participate fully in the actions required to plan and develop the data, and share ownership of those data. This same offer to cost-share and jointly work to develop and own data is simultaneously being made to United Phosphorus, Inc., FMC Agricultural Solutions who now control the mancozeb registration listed in the DCI as Cheminova Inc., and to Drexel Chemical Company.

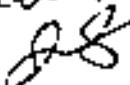
Please be notified that Agria S.A. has undertaken to transfer registrations of mancozeb products owned by Agria Canada to Agria S.A. This transfer does not in any way alter Agria's commitment to respond to the DCI.

Sincerely,



Don O'Shaughnessy

cc Dave Olson, Chairman

Reed 9.22.16


From: UPS QuantumView qview@ups.com
Subject: UPS Delivery Notification, Tracking Number 1Z23V10A0199930992
Date: September 21, 2016 8:01 AM
To: dclxx@mac.com



Your package has been delivered.

Delivery Date: Wednesday, 09/21/2016

Delivery Time: 09:02 AM

At the request of D O'SHAUGHNESSY CONSULTING INC., this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number: 1Z23V10A0199930992

Dave Olson
United Phosphorus Inc.
630 FREEDOM BUSINESS CTR DR
ROOM 402
KING OF PRUSSIA, PA 19406
US

UPS Service: UPS NEXT DAY AIR

Number of Packages: 1

Shipment Type: Letter

Delivery Location: OFFICE

Signed by: STEWART



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dōc
D. O'Shaughnessy Consulting, Inc.

Sept 17, 2016

Drexel Chemical Company
PO Box 13327
Memphis, TN 38113-0327

To whom it may concern,
RE: US EPA Mancozeb Generic Data Call-In ("DCI"), June 23, 2016, Offer to Cost-Share

D. O'Shaughnessy Consulting, Inc. is the designated Agent for Agria in matters of North American regulation of pesticide products, and is authorized to make the following offer..

Please be hereby advised that Agria S.A. (Bulgaria) and its wholly-owned subsidiary, Agria Canada, Inc. ("Agria") hereby offers to share costs of development of generic data as listed in the subject DCI with the following exception. Agria intends to submit its own existing data for requirement SS-1318 (Horleybee larval chronic oral toxicity). Agria conditionally offers to cost-share for this requirement only in the event that US EPA deems the existing data owned by Agria to be insufficient for this DCI.

Agria offers to participate fully in the actions required to plan and develop the data, and share ownership of those data. This same offer to cost-share and jointly work to develop and own data is simultaneously being made to United Phosphorus, Inc., FMC Agricultural Solutions who now control the mancozeb registration listed in the DCI as Cheminova Inc., and to the Mancozeb and ETU Task Forces, which represent other generic data developers not named in the DCI.

Please be notified that Agria S.A. has undertaken to transfer registrations of mancozeb products owned by Agria Canada to Agria S.A. This transfer does not in any way alter Agria's commitment to respond to the DCI.

Sincerely,



Don O'Shaughnessy


John D. O'Shaughnessy
Recd 9/22/16

From: UPS Quantum View qv.ups.com
Subject: UPS Delivery Notification, Tracking Number 1Z22V10A0197461574
Date: September 21, 2016 at 10:04 AM
To: doctor@msn.com



Your package has been delivered.

Delivery Date: Wednesday, 09/21/2016

Delivery Time: 09:56 AM

At the request of D O'SHAUGHNESSY CONSULTING INC., this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number: 1Z22V10A0197461574

Drexel Chemical Company
1700 CHANNEL AVE
MEMPHIS, TN 38113
US

UPS Service: UPS NEXT DAY AIR

Number of Packages: 1

Weight: 0.3 LBS

Delivery Location: DOCK

Signed by: ERIDGEWATER



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dOC
D. O'Shaughnessy Consulting, Inc.

Sept 17, 2016

FMC Agricultural Solutions
2929 Walnut St
Philadelphia, PA 19104
tel 215-299-6000

To Whom It May Concern:

RE: US EPA Mancozeb Generic Data Call-In ("DCI"), June 23, 2016. Offer to Cost-Share

D. O'Shaughnessy Consulting, Inc. is the designated Agent for Agria in matters of North American regulation of pesticide products, and is authorized to make the following offer.

We are aware that the mancozeb product listed under Cheminova Inc. in the subject DCI is now in control of FMC Agricultural Solutions. Please be hereby advised that Agria S.A. (Bulgaria) and its wholly-owned subsidiary, Agria Canada, Inc. ("Agria") hereby offers to share costs of development of generic data as listed in the subject DCI with the following exception. Agria intends to submit its own existing data for requirement SS-1318 (honeybee larval chronic oral toxicity). Agria conditionally offers to cost-share for this requirement only in the event that US EPA deems the existing data owned by Agria to be insufficient for this DCI.

Agria offers to participate fully in the actions required to plan and develop the data, and share ownership of these data. This same offer to cost-share and jointly work to develop and own data is simultaneously being made to Dixie Chemical Company, United Phosphorus, Inc. and the Mancozeb and ETU Task Forces, which represent other generic data developers not named in the DCI.

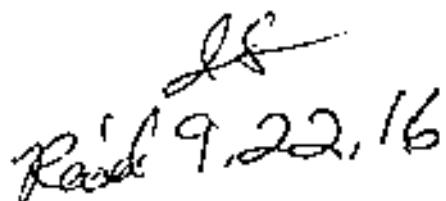
Please be notified that Agria S.A. has undertaken to transfer registrations of mancozeb products owned by Agria Canada to Agria S.A. This transfer does not in any way alter Agria's commitment to respond to the DCI.

Sincerely,



Don O'Shaughnessy

cc Paula Bodey, FMC Regulatory Affairs



Rec'd 9.22.16

From: UPS Quantum View lkqimbo@ups.com
Subject: UPS Delivery Notification, Tracking Number 1Z23V10A0197936589
Date: September 21, 2016 at 9:05 AM
To: docxsl4@msn.com



Your package has been delivered.

Delivery Date: Wednesday, 09/21/2016

Delivery Time: 09:53 AM

At the request of D O'SHAUGHNESSY CONSULTING INC., this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number: 1Z23V10A0197936589

Paula Bodey
PMC Agricultural Solutions
2929 WALNUT ST
PHILADELPHIA, PA 19104
US

UPS Service: UPS NEXT DAY AIR

Number of Packages: 1

Weight: 0.31 lbs

Delivery Location: RECEIVER

Signed by: BULLOCK



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